

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
LISA ANN GALAZ,	§	Case No. 07-53287 rbk
	§	
Debtor.	§	Ch. 13

LISA ANN GALAZ,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	ADVERSARY NO. 11-05015 rbk
	§	
WORLDWIDE SUBSIDY GROUP, LLC	§	
DENISE VERNON, and	§	
MARIAN OSHITA,	§	
	§	
Defendants.	§	

DENISE VERNON'S MOTION FOR CONTINUANCE

NOW COMES **DENISE VERNON**, Movant herein, and files this her Motion for Continuance and in support thereof would show the Court the following:

I.

Plaintiff, Lisa Galaz, filed her Verified Complaint, Application for Turnover Order and Application for Temporary Restraining Order and Preliminary Injunction on February 14, 2011.

II.

The Court has set the hearing on said Complaint for March 2, 2011 at 9:30 a.m. Counsel for Denise Vernon has not received formal notice of the setting date and time.

III.

Counsel for Defendant, Denise Vernon, would show that he is scheduled for trial on March 2, 2011 in the case of *In the Interest of Kale Alexander Coppins, A Minor Child* in the State District Court of Bexar County, Texas under Cause No. 2008-CI-19897. Counsel for Defendant is a solo practitioner and does not have another attorney to cover this trial.

In addition, a witness, Brian Boydston, will be out of the country until after March 16, 2011. Mr. Boydston who is the business manager for Worldwide Subsidy Group, LLC, and will be an important witness as to the allegations set forth in Ms. Galaz's motion.

IV.

This motion is not made for purposes of delay but rather that just may be served. Defendant does not feel that Plaintiff will in any way be prejudiced by the granting of this continuance. Ms. Galaz has access to the financial accounts of WSG.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court grant this Motion for Continuance and for such other and further relief to which she may be justly entitled.

Respectfully submitted,

/s/ Richard P. Corrigan

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ATTORNEY FOR DENISE VERNON

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of February, 2011, a true and correct copy of the above and foregoing has been served by electronic means through CM/ECF system; certified mail, return receipt requested, postage prepaid; United States First Class mail, postage prepaid; overnight delivery; facsimile transmission; and/or hand delivery, on the parties listed below:

Royal Lea
Bingham & Lea, P.C.
319 Maverick St.
San Antonio, TX 78212

Mary K. Viegelahn
Chapter 13 Trustee
909 NE Loop 410, Suite 400
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Office of the U.S. Trustee
P.O. Box 1539
San Antonio, TX 78295

/s/ Richard P. Corrigan
RICHARD P. CORRIGAN